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Counsel to Parmjit Singh Parmar (a/k/a Paul Parmar) and the Parmar Entities

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

Orion HealthCorp., Inc., et al.,

Debtors

Orion HealthCorp., Inc., et al.,

Plaintiffs.

v.

Parmjit Singh Parmar (a/k/a Paul Parmar, et al.),

Defendants,

Chapter 11 Case

Nos. 18-71748 (AST) through
18-71789 (AST)

(Jointly Administered)

Adv. Pro. No. 18-08053 (AST)

**AFFIRMATION OF CHARLES E. SIMPSON CORRECTING DEFENDANTS
LISTED AS MOVANTS AND REPRESENTED BY
WINDELS MARX LANE & MITTENDORF, LLP**

Charles E. Simpson, an attorney duly admitted and duly licensed to practice law by the Appellate Division of the State of New York, First Department, and by the United States District Court for the Southern and Eastern Districts of New York, hereby affirms the following under penalty of perjury:

1. I am a Member of the law firm of Windels Marx Lane & Mittendorf, LLP (“Windels Marx”), attorneys for Parmjit Parmar (“Paul Parmar”) and affiliated entities captioned as Defendants and referred to herein as the “Parmar Entities”.

2. With respect to the two (2) filings by Windels Marx in the above captioned Chapter 11 case (Docket Nos. 264 and 266, respectively), a Notice of Motion and an Application in Support of Motion, the Notice of Motion contains the names of the individuals and entities alleged to be within the definition of “Parmar Entities”. However, it has been brought to the attention of the undersigned and Windels Marx and, upon review, confirmed by the undersigned that certain of the entities named as being represented by the undersigned and Windels Marx, namely the following:

- A. CHT Holdco LLC;
- B. AAKB Investments Limited; and
- C. Aquila Alpha LLC

are, in fact, not represented by Windels Marx and do not fall within the definition of “Parmar Entities”.

3. Based upon the above, the undersigned and Windels Marx have filed the attached Amended Notice of Motion deleting the above-named entities as “Parmar Entities” and as represented by the undersigned and Windels Marx. A copy of the Amended Notice of Motion is annexed hereto as **Exhibit “A”**.

Dated: New York, New York
June 24, 2020

WINDELS MARX LANE & MITTENDORF, LLP

By: /s/ Charles E. Simpson
Charles E. Simpson
A Member of the Firm

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New York, NY 10019
Tel: (212) 237-1000
Email: csimpson@windelsmarx.com

Attorneys for Defendants, Parmjit Singh Parmar, et al.

Exhibit “A”

In re:

Orion HealthCorp, Inc.
Constellation Healthcare Technologies, Inc.
NEMS Acquisition, LLC
Northeast Medical Solutions, LLC
NEMS West Virginia, LLC
Physicians Practice Plus, LLC
Physicians Practice Plus Holdings, LLC
Medical Billing Services, Inc.
Rand Medical Billing, Inc.
RMI Physician Services Corporation
Western Skies Practice Management, Inc.
Integrated Physician Solutions, Inc.
NYNM Acquisition, LLC
Northstar FHA, LLC
Northstar First Health, LLC
Vachette Business Services, LTD.
MDRX Medical Billing, LLC
Vega Medical Professionals, LLC
Allegiance Consulting Associates, LLC
Allegiance Billing & Consulting, LLC
Phoenix Health, LLC,

Debtors.

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Case No. 18-71748 (AST)
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Case No. 18-71749 (AST)
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Case No. 18-71765 (AST)
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Case No. 18-71766 (AST)
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Case No. 18-71767 (AST)
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Case No. 18-71789 (AST)

(Jointly Administered)

Orion Healthcorp, Inc., *et al.*,

Plaintiffs,

V.

Parmjit Singh Parmar (a/k/a Paul Parmar), Sotirios Zaharis, :
Ravi Chivukula, Pavandeep Bakhshi, Naya Constellation :
Health, LLC, Alpha Cepheus, LLC, Constellation Health :
Investment, LLC, Constellation Health Group, LLC, :
Constellation Health, LLC, First United Health, LLC, Taira :
no Kiyomori LLC, Blue Mountain Healthcare, LLC, CC :
Capital CHT Holdco LLC, CHT Holdco LLC, PBPP :
Partners LLC, Axis Medical Services, LLC, Vega Advanced :
Care LLC, Pulsar Advance Care LLC, Lexington Landmark :

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(AST)

Services LLC, MYMSMD LLC, PPSR Partners, LLC, :
AAKB Investments Limited, Destra Targeted Income Unit :
Investment Trust, on behalf of unitholders, a Delaware :
Statutory Trust, United States of America, Aquila Alpha :
LLC, 2 River Terrace Apartment 12J, LLC, Dioskouroi :
Kastor Polydeuces, LLC, 21B One River Park LLC, Aquila :
Alshain LLC, Ranga Bhoomi LLC, Harmohan Parmar :
(a/k/a Harry Parmar), Kiran Sharma, The Red Fronted :
Macaw Trust, Young Conaway Stargatt & Taylor, LLP (in :
its capacity as Escrow Agent), Blue Cross Blue Shield of :
South Carolina, Honorable Trinidad Navarro, Insurance :
Commissioner of the State of Delaware, in his capacity as :
Receiver, and John Does 1 through 100 inclusive, :
: :
Defendants. :
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**AMENDED NOTICE OF MOTION FOR A STAY
OF ACTION UNDER THE FIFTH
AMENDMENT TO THE
UNITED STATES CONSTITUTION**

PLEASE TAKE NOTICE that upon the application of Defendants, Parmjit Singh Parmar (a/k/a Paul Parmar), Naya Constellation Health, LLC, Alpha Cepheus, LLC, Constellation Health Investment, LLC, Constellation Health Group, LLC, Constellation Health, LLC, First United Health, LLC, Taira no Kiyomori LLC, Blue Mountain Healthcare, LLC, PBPP Partners LLC, Axis Medical Services, LLC, Vega Advanced Care LLC, Pulsar Advance Care LLC, Lexington Landmark Services LLC, MYMSMD LLC, PPSR Partners, LLC, 2 River Terrace Apartment 12J, LLC, Dioskouroi Kastor Polydeuces, LLC, 21B One River Park LLC, Aquila Alshain LLC, Ranga Bhoomi LLC, Harmohan Parmar (a/k/a Harry Parmar), Kiran Sharma, The Red Fronted Macaw Trust (“Moving Defendants”), by their attorney, Charles E. Simpson, Esq., Moving Defendants will move this Court before the Hon. Alan S. Trust, U.S.B.J., at the Courthouse located at 100 Federal Plaza, Courtroom 960, Central Islip, New York 11722, on September 21, 2020, at 11:00 in the forenoon or as soon thereafter as counsel can be heard, for an order pursuant to 11 USC §105, staying this case as against moving

Defendants under the Fifth Amendment to the United States Constitution, and for such other and further relief as to this Court may seem just, equitable and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief herein shall be in writing, shall state with particularity the grounds for the objection, shall be filed with the Clerk of the Bankruptcy Court, and served upon the undersigned counsel for the Plaintiff at least seven (7) days prior to the hearing date of the within motion.

Dated: New York, New York
June 24, 2020

WINDELS MARX LANE & MITTENDORF, LLP

By: /s/ Charles E. Simpson
Charles E. Simpson
A Member of the Firm

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New York, New York 10019
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*Attorneys for Defendants,
PARMJIT SINGH PARMAR, et al.*